

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No.: 1:20-cv-00998

GREGORY DRUMWRIGHT,  
EDITH ANN JONES, and  
JUSTICE FOR THE NEXT  
GENERATION,

Plaintiffs,

V.

TERRY JOHNSON, in his official and individual capacities as Alamance County Sheriff, and MARY KRISTY COLE, in her official and individual capacities as Graham Chief of Police,

Defendants.

**RESPONSE OF PATRICK H.  
FLANAGAN TO ORDER TO  
SHOW CAUSE RE: SANCTIONS**

TO THIS HONORABLE COURT:

Defense counsel Patrick H. Flanagan hereby responds to this Court's text order to show cause issued November 11, 2021, as follows:

I sincerely apologize to this Court for my absence at the October 25<sup>th</sup> pretrial conference. I did not intend to disregard the Court's order directing all counsel to appear on October 25, 2021, but instead it was a misinterpretation on my part of what the Court meant by "all counsel." I knew that my law partner, Paul Gessner, would be attending the pretrial conference and speaking on behalf of our client. I mistakenly believed that

was sufficient representation at the conference. It was my error and only my error.

I admit that I should have clarified the Court's Order with this Court.

I ask the Court's forgiveness and promise not to assume I understand the Court's intent related to any further Orders.

This the 16th day of November, 2021.

BY: /s/Patrick H. Flanagan  
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